

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DONALD J. TRUMP FOR)	CIVIL ACTION
PRESIDENT, INC., ET AL.)	
)	(Judge Brann)
)	
Plaintiffs,)	
)	
v.)	No. 4:20-CV-02078
)	
KATHY BOOCKVAR, ET AL.)	
)	
Defendants.)	

**MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Plaintiffs hereby move for a temporary restraining order and preliminary injunction barring Defendants from certifying the results of the November 3, 2020 General election. Plaintiffs are entitled to that relief—which will give this Court time to rule on the merits before the safe harbor date of December 8, 2020—for the reasons outlined in the attached memorandum.

Respectfully submitted,

/s/ Linda A. Kerns
Linda A. Kerns, Esquire
Law Offices of Linda A. Kerns, LLC
Attorney ID 84495
1420 Locust Street, Suite 200
Philadelphia, PA 19102
T: 215-731-1413
lak@lindakernslaw.com
Counsel for all Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November, 2020, I served a true and correct copy of the foregoing motion and attachments via the CM/ECF system.

/s/ Linda A. Kerns

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)	(Judge Brann)
Plaintiffs,)	
)	
v.)	
)	
KATHY BOOCKVAR, ET AL.)	
)	
Defendants.)	

**PROPOSED ORDER GRANTING PLAINTIFFS’
VERIFIED MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

Upon consideration of Plaintiffs’ motion for temporary restraining order and preliminary injunction and accompanying attachments; any oppositions thereto; any reply; and for good cause shown, it is hereby:

ORDERED that Plaintiffs’ Motion is **GRANTED**.

FURTHER ORDERED that Defendants (including their officers agents, servants, employees, attorneys, and any persons acting in active concert or participation with them) shall refrain from certifying the results of the November 3, 2020 general election pending further order of this Court.

November ____, 2020

The Honorable Matthew W. Brann